

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

**UNITED STATES OF AMERICA**

§

**V.**

§ **CASE NO. 4:19-CR-00232-1**

**RICHARD GARZA**

§

**DEFENDANT'S UNOPPOSED MOTION TO TRAVEL  
BEYOND THE SOUTHERN DISTRICT OF TEXAS**

**TO THE HONORABLE JUDGE OF SAID COURT:**

**COMES NOW** Defendant Richard Garza, by and through his attorney of record, E. Matthew Leeper, III, and respectfully moves this Honorable Court to grant Defendant permission to travel to Seattle, Washington for the following reasons to wit:

I.

Mr. Richard Garza wishes to travel to the Pacific Northwest, specifically Seattle Washington for a period of four days. The dates of travel would be Monday, August 12th to Thursday, August 15th, 2019. If this motion is granted, Mr. Garza plans to leave Houston on August 12th and return to the Houston area in the late afternoon hours on August 15th, 2019.

II.

Defense counsel has consulted with AUSA Quincy Ollison via electronic mail and he has no objection to the requested travel. Additionally, USPO Tyson Gage has been notified and he has no objection.

For the foregoing reason, Defendant respectfully prays that this Honorable Court grant his

request to travel to Seattle, Washington on the aforementioned dates.

Respectfully submitted,

E. Matthew Leeper, III

E. Matthew Leeper, III

OBA #31622

5225 Katy Fwy. Suite 305

Houston, TX 77007

Phone No. (713) 228-6141

**CERTIFICATE OF CONFERENCE**

I certify that I consulted with AUSA Quincy Ollison on July 26th, 2019 and he is unopposed to this Motion To Travel.

/s/ Emmett Matthew Leeper, III

Emmett Matthew Leeper, III

**CERTIFICATE OF SERVICE**

I, E. Matthew Leeper, III, hereby certify that on this 29th day of July, 2019, I provided a true and correct copy of Defendant's Motion to Travel beyond the Southern District of Texas by electronic filing to Assistant United States Attorney Quincy Ollison.

/s/ E. Matthew Leeper, III

E. Matthew Leeper, III